

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**DOUGLAS HANDSHOE**

**PLAINTIFF**

**VERSUS**

**CIVIL ACTION NO: 1:13CV251 LG JMR**

**AARON F. BROUSSARD, DANIEL ABEL,  
CHARLES LEARY, VAUGHN PERRET,  
CHRIS YOUNT, TROUT POINT LODGE  
LIMITED, NOVA SCOTIA ENTERPRISES, LLC**

**DEFENDANTS**

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**MOTION TO DISMISS OF DEFENDANTS, CHARLES LEARY, VAUGHN  
PERRET, AND TROUT POINT LODGE, LIMITED**

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COME NOW Defendants CHARLES LEARY, VAUGHN PERRET, AND TROUT POINT LODGE, LIMITED and file this their motion pursuant to Federal Rules of Civil Procedure 12 to dismiss the Complaint filed against them; and in support would show the Court lacks subject matter jurisdiction, the Court lacks personal jurisdiction, the venue is improper, and Plaintiff fails to state a claim upon which relief can be granted.

Defendants CHARLES LEARY, VAUGHN PERRET, AND TROUT POINT LODGE, LIMITED therefore move the Court to dismiss the Complaint with prejudice.

RESPECTFULLY SUBMITTED this the 12<sup>th</sup> day of June, 2013.

CHARLES LEARY, VAUGHN PERRET,  
AND TROUT POINT LODGE, LIMITED,

By: s/ Henry Laird  
Henry Laird, MS Bar No. 1774

**CERTIFICATE OF SERVICE**

I, Henry Laird, of the law firm of Jones Walker LLP do hereby certify that I have sent a true and correct copy of the foregoing Motion to Dismiss by using the ECF system to the following:

Douglas Handshoe  
214 Corinth Drive  
Bay St. Louis, Mississippi 39520  
VIA UNITED STATES MAIL AND EMAIL: [earning04@gmail.com](mailto:earning04@gmail.com)

This the 23<sup>rd</sup> day of June, 2013.

s/ Henry Laird  
Henry Laird

Henry Laird (MSB No. 1774)  
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